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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE IN
SUPPORT OF ADVERTISER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
META PLATFORMS, INC.'S MATERIAL
SHOULD BE SEALED**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am a partner at Bathae Dunne LLP, counsel
4 for Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set
5 forth here and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Administrative Motion to
7 Consider Whether Meta Platforms, Inc.'s Material Should Be Sealed, filed in connection with the
8 concurrently filed Advertiser Plaintiffs' Opposition to the Omnibus Motion to Seal Materials
9 Submitted in Connection with Summary Judgment and *Daubert* Briefing in the Advertiser Case
10 ("Opposition").

11 3. Certain documents and information referenced in the Opposition have been designated
12 by Defendant Meta Platforms, Inc. ("Meta") as "Confidential" or "Highly Confidential" under the
13 Protective Order in this action.

14 4. Portions of the Opposition referencing or reflecting the contents of the documents or
15 information designated by Meta as "Confidential" or "Highly Confidential" have been redacted from
16 the publicly filed version of the Opposition. *See* Civil L.R. 79-5(e)(1).

17 5. An unredacted version of the Opposition with these references highlighted in yellow
18 is filed herewith. *See* Civil L.R. 79-5(e)(2), (f)(1).

19 6. Advertiser Plaintiffs' request in this motion is limited to documents and information
20 produced by Meta marked "Confidential" or "Highly Confidential," or information directly reflecting
21 documents and information produced by Meta marked "Confidential" or "Highly Confidential." This
22 request is thus narrowly tailored to seek temporary sealing only of potentially sealable material.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed on March
24 18, 2025, in Austin, Texas.

25 /s/ Brian J. Dunne
26 Brian J. Dunne
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